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**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

JEFFREY SCHULKEN AND JENIFER)	CASE NO. 5:09-cv-02708-LHK
SCHULKEN, individually and on behalf of a)	
class of similarly situated individuals,)	STIPULATION AND PROPOSED
Plaintiffs,)	ORDER TO CONTINUE EXPERT
)	DISCOVERY DEADLINES
v.)	
WASHINGTON MUTUAL BANK,)	
HENDERSON, NEVADA; JPMORGAN CHASE)	Fifth Am. Complaint filed: 10/14/2011
BANK, N.A.,)	Judge: Hon. Lucy H. Koh
Defendants.)	
)	

WHEREAS, on October 13, 2011, the Court held a hearing on Plaintiffs' Motion for Class Certification which the Court took under advisement;

Whereas, on October 14, 2011, Plaintiffs Jeffrey and Jennifer Schulken ("Plaintiffs") filed their Fifth Amended Complaint, to which Defendant JPMorgan Chase Bank, N.A. ("Defendant") filed its Answer on October 28, 2011;

1 WHEREAS, on December 30, 2011, the Parties file a proposed Stipulation asking the
2 Court to continue discovery deadlines, including deadlines related to expert discovery. The
3 reason was, at that time, the Parties were uncertain as to what expert discovery may be
4 needed or relevant following this Court's ruling on Plaintiffs' Motion for Class Certification;

5 WHEREAS, on January 5, 2012, this Court entered an Order Granting in Part and
6 Denying in Part Plaintiffs' Motion for Class Certification.

7 WHEREAS, the present deadlines for expert disclosures are set as follows:

8 Additional expert disclosures: March 2, 2012

9 Additional rebuttal expert disclosures: March 23, 2012

10 Discovery cut-off: March 30, 2012

11 WHEREAS, during the Case Management Conference on February 15, 2012, this
12 Court Ordered that if the Parties were going to settle this matter, a Motion for Preliminary
13 Approval had to be filed by March 7, 2012. The Parties have exchanged a draft settlement
14 agreement together with proposed notices and are hopeful to meet the Court's deadline.

15 WHEREAS, to attempt to reach an agreement that can be filed by the Court's
16 deadline, the Parties respectfully request a 10 day continuance of the additional expert
17 disclosure deadlines. The new dates would be as follows:

18 Additional expert disclosures: March 12, 2012

19 Additional rebuttal expert disclosures: March 24, 2012

20 Discovery cut-off: March 30, 2012

21 This Stipulation is made in good faith and not for the purposes of delaying this
22 litigation.

Respectfully submitted,

Dated: March 2, 2012

By: /s/ Sean Reis

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Dated: March 2, 2012

By: /s/ Victoria Collado

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ORDER

Pursuant to the stipulation,
IT IS SO ORDERED.

Dated: March 8, 2012


UNITED STATES DISTRICT JUDGE LUCY H. KOH